

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HOLLY WISER-CONNOLLY, as
Independent Executor of the Estate of)
GLEN R. WISER, Deceased; and)
HOLLY WISER-CONNOLLY, as)
Independent Executor of the Estate of)
ELEANOR M. WISER, Deceased,)

Plaintiffs,)

-vs-)

OSMAN EFENDIC, individually, and)
d/b/a **ELAINES EXPRESS, INC.**,)

Defendant.)

Case No. 08 C 241

OSMAN EFENDIC, Individually and)
d/b/a **ELAINES EXPRESS, INC.**,)

Judge: Ronald A. Guzman

Counter-Plaintiffs,)

Magistrate: Geraldine Soat Brown

-vs-)

HOLLY WISER-CONNOLLY, as)
Independent Executive of the Estate of)
GLEN R. WISER, Deceased,)

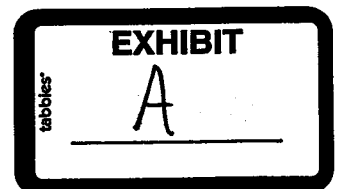
Counter-Defendant.)

NOTICE OF DEPOSITIONS

To: Edmund J. Scanlan, Scanlan Law Group, 8 S. Michigan Ave., Suite
2700, Chicago, Illinois, 60603
cc: Brian M. Hogan, Ripes, Nelson, Baggott & Kalobratsos, P.C., 205 W.
Randolph St., Suite 1900, Chicago, IL 60606

<u>Deponent</u>	<u>Date</u>	<u>Time</u>
Holly Wiser-Connolly	May 5, 2008	10:00 a.m.
Allen Glen Wiser	May 5, 2008	2:00 p.m.
Raymond Wiser	May 6, 2008	10:00 a.m.

YOU ARE HEREBY NOTIFIED that the undersigned will take the depositions of the above-named deponents on the above-noted dates and times before a Notary Public or any other duly authorized officer at **Johnson & Bell, Ltd., 33 West Monroe Street, Suite 2700, Chicago, Illinois, 60603.**

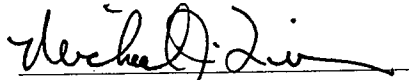


YOU ARE HEREBY FURTHER NOTIFIED pursuant to the Federal Rules of Civil Procedure that you are by this Notice required to have present on the dates, times, and places stated the said deponents for oral examination.

See attached Rider.

JOHNSON & BELL, LTD.

BY:

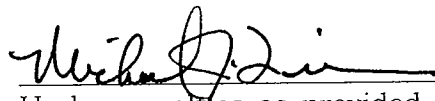
A handwritten signature in black ink, appearing to read "Michael J. Linneman", written over a horizontal line.

Michael J. Linneman

Robert M. Burke
Michael J. Linneman
JOHNSON & BELL, LTD.
Attorneys for Defendants/Counter-Plaintiffs
33 West Monroe Street, #2700
Chicago, Illinois 60603
(312) 372-0770

STATE OF ILLINOIS)
) SS.
COUNTY OF COOK)

MICHAEL J. LINNEMAN, being first duly sworn upon oath, deposes and states that he served a copy of the above and foregoing NOTICE OF DEPOSITIONS to all attorneys of record by mailing a copy of same to the above referenced parties this 1st day of April, 2008.

A handwritten signature in black ink, appearing to read "Michael J. Linneman", written over a horizontal line.

Under penalties as provided by law pursuant to ILL.REV.STAT. CHAP. 110 Sec. 1-109, I certify that the statements set forth herein are true and correct.

JOHNSON & BELL, LTD.
33 West Monroe, Suite 2700
Chicago, Illinois 60603
(312) 372-0770

RIDER

At the time and place aforesaid, the deponent is hereby directed to produce the following documents:

1. Any and all photographs, slides, videotapes and motion pictures of the scene of the occurrence, the vehicles involved herein, or of any of the parties hereto.
2. Any and all medical bills allegedly incurred as a result of the occurrence alleged in plaintiff's Complaint, including, but not limited to, bills of medical doctors, osteopaths, chiropractors, physiotherapists, pharmacists, hospitals and clinics.
3. Any and all medical records in the possession of the deponent and her counsel relating to any injuries allegedly sustained or otherwise related to the occurrence alleged in plaintiff's Complaint.
4. Any and all photographs, which Plaintiff may utilize at trial, depicting Glen R. Wiser and Eleanor M. Wiser.
5. Copies of the Glen R. Wiser's and Eleanor M. Wiser's Federal and State Income Tax Returns for the years 2003, 2004, 2005, 2006 and 2007, and if filed separately, the income tax returns for those same years for Glen R. Wiser and Eleanor M. Wiser.
6. Any and all other documents which Plaintiff intends to introduce to support her claim for damages at the time of trial.

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

HOLLY WISER-CONNOLLY, as)	
Independent Executor of the Estate of)	
GLEN R. WISER, Deceased; and)	
HOLLY WISER-CONNOLLY, as)	
Independent Executor of the Estate of)	
ELEANOR M. WISER, Deceased,)	Case No.: 08 C 241
)	
Plaintiff,)	Judge: Ronald A. Guzman
)	
vs.)	Magistrate: Geraldine Soat Brown
)	
OSMAN EFENDIC, Individually, and)	
d/b/a ELAINES EXPRESS INC.,)	
)	
Defendants.)	

NOTICE OF DEPOSITION OF ALLEN WISER

TO: Johnson & Bell, Ltd.	Ripes, Nelson, Baggott & Kalobratsos
33 West Monroe Street, Suite 2700	205 West Randolph Street, Suite 1900
Chicago, IL 60603	Chicago, IL 60606

Pursuant to Rule 30 of the Federal Rules of Civil Procedure, notice is hereby given that on the day and at the hour next hereinafter set forth, we will take the deposition of the deponent hereinafter named on oral interrogatories, for the purpose of discovery, before a Notary Public.

DATE OF DEPOSITION: July 11, 2008
TIME OF DEPOSITION: 1:00 p.m. (AKDT)

PLACE OF DEPOSITION: Actual Location to Be Provided at Later Date
(With Speakerphone Capability)
Soldotna, Alaska

NAME OF DEPONENT: ALLEN WISER


EDMUND J. SCANLAN

Edmund J. Scanlan
SCANLAN LAW GROUP
Attorney for Plaintiff
8 South Michigan Avenue, Suite 2700
Chicago, Illinois 60603
Telephone: (312) 422-0343
Facsimile: (312) 422-0358
ARDC #: 02466643



IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION


HOLLY WISER-CONNOLLY, as)	
Independent Executor of the Estate of)	
GLEN R. WISER, Deceased; and)	
HOLLY WISER-CONNOLLY, as)	
Independent Executor of the Estate of)	
ELEANOR M. WISER, Deceased,)	Case No.: 08 C 241
)	
Plaintiff,)	Judge: Ronald A. Guzman
)	
vs.)	Magistrate: Geraldine Soat Brown
)	
OSMAN EFENDIC, Individually, and)	
d/b/a ELAINES EXPRESS INC.,)	
)	
Defendants.)	

CERTIFICATE OF SERVICE

TO: Johnson & Bell, Ltd.	Ripes, Nelson, Baggott & Kalobratsos
33 West Monroe Street, Suite 2700	205 West Randolph Street, Suite 1900
Chicago, IL 60603	Chicago, IL 60606

Under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, the undersigned certifies that on April 2, 2008, the following described document was served upon counsel of record by placing a true and correct copy thereof in an envelope addressed as shown above; that said envelope was sealed; that sufficient U.S. postage for first-class mail was placed thereon; and the same was deposited in the U.S. Mail at 8 South Michigan Avenue, Chicago, Illinois, at or about the hour of 5:00 p.m.

Notice of Deposition of Allen Wiser



Edmund J. Scanlan
SCANLAN LAW GROUP
Attorney for Plaintiff
8 South Michigan Avenue, Suite 2700
Chicago, Illinois 60603
Telephone: (312) 422-0343
Facsimile: (312) 422-0358
ARDC #: 02466643

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

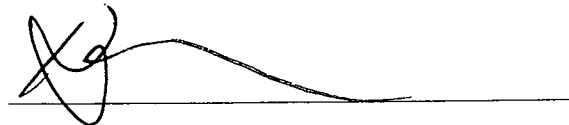
HOLLY WISER-CONNOLLY, as)	
Independent Executor of the Estate of)	
GLEN R. WISER, Deceased; and)	
HOLLY WISER-CONNOLLY, as)	
Independent Executor of the Estate of)	
ELEANOR M. WISER, Deceased,)	Case No.: 08 C 241
)	
Plaintiff,)	Judge: Ronald A. Guzman
)	
vs.)	Magistrate: Geraldine Soat Brown
)	
OSMAN EFENDIC, Individually, and)	
d/b/a ELAINES EXPRESS INC.,)	
)	
Defendants.)	

CERTIFICATE OF SERVICE

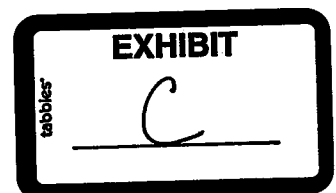
TO: Johnson & Bell, Ltd.	Ripes, Nelson, Baggott & Kalobratsos
33 West Monroe Street, Suite 2700	205 West Randolph Street, Suite 1900
Chicago, IL 60603	Chicago, IL 60606

Under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, the undersigned certifies that on April 7, 2008, the following described document was served upon counsel of record by placing a true and correct copy thereof in an envelope addressed as shown above; that said envelope was sealed; that sufficient U.S. postage for first-class mail was placed thereon; and the same was deposited in the U.S. Mail at 8 South Michigan Avenue, Chicago, Illinois, at or about the hour of 5:00 p.m.

Amended Notice of Deposition of Allen Wiser



Edmund J. Scanlan
SCANLAN LAW GROUP
Attorney for Plaintiff
8 South Michigan Avenue, Suite 2700
Chicago, Illinois 60603
Telephone: (312) 422-0343
Facsimile: (312) 422-0358
ARDC #: 02466643



IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

HOLLY WISER-CONNOLLY, as)	
Independent Executor of the Estate of)	
GLEN R. WISER, Deceased; and)	
HOLLY WISER-CONNOLLY, as)	
Independent Executor of the Estate of)	
ELEANOR M. WISER, Deceased,)	Case No.: 08 C 241
)	
Plaintiff,)	Judge: Ronald A. Guzman
)	
vs.)	Magistrate: Geraldine Soat Brown
)	
OSMAN EFENDIC, Individually, and)	
d/b/a ELAINES EXPRESS INC.,)	
)	
Defendants.)	

AMENDED NOTICE OF DEPOSITION OF ALLEN WISER

TO: Johnson & Bell, Ltd.	Ripes, Nelson, Baggott & Kalobratsos
33 West Monroe Street, Suite 2700	205 West Randolph Street, Suite 1900
Chicago, IL 60603	Chicago, IL 60606

Pursuant to Rule 30 of the Federal Rules of Civil Procedure, notice is hereby given that on the day and at the hour next hereinafter set forth, we will take the deposition of the deponent hereinafter named on oral interrogatories, for the purpose of discovery, before a Notary Public.

DATE OF DEPOSITION: July 11, 2008

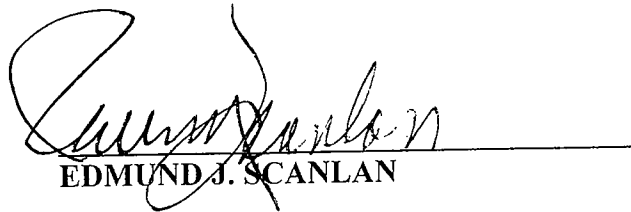
TIME OF DEPOSITION: 1:00 p.m. (AKDT)

PLACE OF DEPOSITION:

**Kenai Airport Hotel
230 North Willow Street
Meeting Room
(With Speakerphone Capability)
KENAI, ALASKA 99611
(907) 283-1577**

NAME OF DEPONENT:

ALLEN WISER



EDMUND J. SCANLAN

Edmund J. Scanlan
SCANLAN LAW GROUP
Attorney for Plaintiff
8 South Michigan Avenue, Suite 2700
Chicago, Illinois 60603
Telephone: (312) 422-0343
Facsimile: (312) 422-0358
ARDC #: 02466643

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

HOLLY WISER-CONNOLLY, as)	
Independent Executor of the Estate of)	
GLEN R. WISER, Deceased; and)	
HOLLY WISER-CONNOLLY, as)	
Independent Executor of the Estate of)	
ELEANOR M. WISER, Deceased,)	Case No.: 08 C 241
)	
Plaintiffs,)	Judge: Ronald A. Guzman
)	
vs.)	Magistrate: Geraldine Soat Brown
)	
OSMAN EFENDIC, Individually, and)	
d/b/a ELAINES EXPRESS INC.,)	
)	
Defendants.)	

**ANSWERS TO INTERROGATORIES OF PLAINTIFF,
HOLLY WISER CONNOLLY, AS INDEPENDENT EXECUTOR
OF THE ESTATE OF GLEN R. WISER, DECEASED**

NOW COMES the Plaintiff, HOLLY WISER-CONNOLLY, as Independent Executor of the Estate of GLEN R. WISER, Deceased, by and through her attorney, EDMUND J. SCANLAN, and in answer to the Interrogatories propounded upon her by the Defendants, OSMAN EFENDIC and 2038463 ONTARIO, INC., d/b/a ELAINE'S EXPRESS, states as follows:

1. State your full name, present address, your date and place of birth, your social security number and your relationship to the decedent.

ANSWER: Holly Lyn Wiser-Connolly
R.R. 2 - Box 98
Xenia, IL 62899
Born February 1, 1955 in Chicago Heights, Illinois
SSN: 324-52-0115
Daughter



2. State the decedent's full name, last address, date and place of birth, social security number and any other name by which decedent was ever known.

ANSWER: Glen Ramon Wiser
R.R. 2 – Box 98
Xenia, IL 62899
Born February 14, 1930 in Shelbyville, Tennessee
SSN: 410-46-5021

3. State whether Glen Wiser has ever been married, and if your answer is in the affirmative, state the name of his spouse, or if more than one, each of his spouses and the date and place of each marriage, if applicable, and state the name and birth date and place of each child born of each marriage and/or the name and adoption date and place of each child adopted during each marriage.

ANSWER:

First Marriage: Alice Willhoite, Tennessee (Divorced)
Son, Raymond Wiser, born May 7, 1950, in Tennessee

Second Marriage: Eleanor Margaret Elliott, Chicago Heights, Illinois
Holly Lyn Wiser, born February 1, 1955, Chicago Heights, Illinois
Allen G. Wiser, born February 13, 1957, Chicago Heights, Illinois

4. State the name, address, age and relationship of each person who claims loss of society, loss of consortium, or any loss recoverable under the Illinois Wrongful Death Act as a result of the decedent's death, as well as the same information for any individual who claims to have been emotionally or financially dependent upon decedent, and state the amount of financial dependence or loss claimed by each such person.

ANSWER: Holly Lyn Wiser-Connolly
R.R. 2 – Box 98
Xenia, IL 62899
Age 53; Daughter

Allen Glen Wiser
44067 K-Beach Road, Unit 1
Soldotna, AK 99669
Age 51; Son

Raymond Wiser
235 Mount Herman Road
Shelbyville, Tennessee
Age 57; Son

5. State the full name and address of each person who witnessed or claims to have witnessed the occurrence alleged in the Complaint.

ANSWER: Osman Efendic
313 Celtic Drive
Stoney Creek, ON L8e3R1 CANADA

Glen R. Wiser, deceased and Eleanor Wiser, deceased
R. R. #2 – Box 98
Xenia, IL 62899

6. State the full name and address of each person not named (in 5) above who was present or claims to have been present at the scene immediately before, at the time of, or immediately after said occurrence.

ANSWER: Responding Officer Jim Wendt, Star #1063
Officer Henry Wright, Star #1713
Officer Terence Bergin, Star #1459
Will County Sheriff's Department
14 West Jefferson Street
Joliet, IL 60432

Personnel from Crete Township Fire Protection District
26064 South Dixie Highway
Crete, IL 60417

Lt. Christ Veste
Crete Township Fire Protection District
26064 South Dixie Highway
Crete, IL 60417

Deputy Coroner Swets
Will County Coroner's Office
57 North Ottawa Street, Suite 412
Joliet, IL 60432

Larry Kochel and Wesley Kochel
Responding Personnel from Kochel's Towing
25800 South Sunset Drive
Monee, IL 60449

7. State the name and address of each person plaintiff intends to call as a witness at the time of trial and provide a statement of the subject matter of the testimony of each witness.

ANSWER:

Osman Efendic

313 Celtic Drive
Stoney Creek, ON L8e3R1 CANADA

The defendant will testify as an adverse witness concerning his knowledge of the facts and circumstances surrounding the March 7, 2007 motor vehicle accident.

Responding Officer Jim Wendt, Star #1063

Will County Sheriff's Department
14 West Jefferson Street
Joliet, IL 60432

The responding police officer will testify regarding his investigation of the March 7, 2007 motor vehicle accident consistent with the report he prepared on the date of the occurrence, as well as his observations of the plaintiffs' decedents.

Officer Henry Wright, Star #1713

Will County Sheriff's Department
14 West Jefferson Street
Joliet, IL 60432

The responding police officer will testify regarding his investigation of the March 7, 2007 motor vehicle accident consistent with the report he prepared on the date of the occurrence, as well as his observations of the plaintiffs' decedents. In addition, Officer Wright will testify that upon his arrival to the accident scene on March 7, 2007, he met with Lt. Chris Veste from the Crete Township fire department who advised him that upon his arrival he was informed by an unknown/unnamed individual that the driver of the semi-tractor/trailer did not have its emergency flashers on at the time of his arrival and that the individual relayed this information and then left without leaving his name, address or any identifying information.

Responding Officer Terence Bergin, Star #1459

Will County Sheriff's Department
14 West Jefferson Street
Joliet, IL 60432

The responding police officer may be called to testify regarding his attendance and photographing of the post-mortem examination of Glen R. Wiser, deceased, on March 7, 2007, as well as any reports he may have prepared or reviewed.

Personnel from Crete Township Fire Protection District

26064 South Dixie Highway
Crete, IL 60417

The responding paramedics and fire department personnel will testify regarding their observations of the plaintiffs' decedents and any care they provided to plaintiffs' decedents at the scene of March 7, 2007 motor vehicle accident.

Lt. Chris Veste

Crete Township Fire Protection District
26064 South Dixie Highway
Crete, IL 60417

Lt. Veste will testify regarding his knowledge of the facts and circumstances surrounding the March 7, 2007, as well as any reports which he prepared or reviewed regarding the occurrence. In addition, he will testify that upon his arrival to the accident scene on March 7, 2007, he met with Officer Henry Wright, Star #1713, from the Will County Sheriff's Department and advised Officer Wright that upon his arrival he was informed by an unknown/unnamed individual that the driver of the semi-tractor/trailer did not have its emergency flashers on at the time of his arrival and that the individual relayed this information and then left without leaving his name, address or any identifying information.

Deputy Coroner Swets

Will County Coroner's Office
57 North Ottawa Street, Suite 412
Joliet, IL 60432

The Will County Coroner arriving at the scene following the March 7, 2007 motor vehicle accident may be called to testify regarding his observations of plaintiffs' decedents and the injuries they suffered resulting in their deaths, consistent with any reports prepared by the Will County Coroner's Office.

Dr. B. Mitchell

Will County Coroner's Office
57 North Ottawa Street, Suite 412
Joliet, IL 60432

The Will County Coroner performing the post-mortem examination of Glen R. Wisner at the Will County Morgue may be called to testify regarding the injuries suffered by plaintiffs' decedents resulting in their deaths, consistent with any reports prepared by the Will County Coroner's Office, including the autopsy report of Glen Wisner, deceased.

Larry Kochel and Wesley Kochel

Kochel's Towing
25800 South Sunset Drive
Monee, IL 60449

The responding personnel from Kochel's Towing may be called to testify regarding their observations at the scene of the March 7, 2007 motor vehicle accident as

well as the removal of the plaintiffs' decedents' vehicle and defendants' vehicle from the scene to its facility, and any other knowledge or information they possess regarding the facts and circumstances surrounding the March 7, 2007 motor vehicle accident.

Holly Lyn Wiser-Connolly

R.R. 2 – Box 98

Xenia, IL 62899

Plaintiffs' decedents' daughter will testify regarding any knowledge she has regarding the facts and circumstances surrounding the March 7, 2007 motor vehicle accident involving her parents; any expenses that she and/or her parents' estate incurred as a result of the March 7, 2007 motor vehicle accident; she will testify regarding her relationship with her parents; the love, support, affection, comfort, guidance, and companionship she experienced throughout the years with her parents; and the grief and sorrow she has experienced as a result of her parents' deaths.

Allen Glen Wiser

44067 K-Beach Road, Unit 1

Soldotna, AK 99669

Plaintiffs' decedents' son will testify regarding any knowledge he has regarding the facts and circumstances surrounding the March 7, 2007 motor vehicle accident involving his parents; he will testify regarding his relationship with his parents; the love, support, affection, comfort, guidance, and companionship he experienced throughout the years with his parents; and the grief and sorrow he has experienced as a result of his parents' deaths.

Raymond Wiser

235 Mount Herman Road

Shelbyville, Tennessee

Plaintiff's decedent's son will testify regarding any knowledge he has regarding the facts and circumstances surrounding the March 7, 2007 motor vehicle accident involving his father; he will testify regarding his relationship with his father; the love, support, affection, comfort, guidance, and companionship he experienced throughout the years with his father, and the grief and sorrow he has experienced as a result of his father's death.

Debbie Weiss

14707 E5000 N Road

Momence, IL 60954

Debbie Weiss, the best friend of Holly Wiser-Connolly, may be called to testify regarding her knowledge of any facts and circumstances surrounding and subsequent to the March 7, 2007 motor vehicle accident.

Warren Weiss

14707 E5000 N Road
Mokenca, IL 60954

Warren Weiss, the husband of Debbie Weiss, the best friend of Holly Wiser-Connolly, may be called to testify regarding his knowledge of any facts and circumstances surrounding and subsequent to the March 7, 2007 motor vehicle accident, including the photographs he took of the plaintiffs' decedents' vehicle, defendants' vehicle, and the site where the accident occurred.

Plaintiff reserves the right to amend her answer until such time as discovery has been closed.

8. With regard to any witness plaintiff intends to call at the time of trial who will offer an opinion, please state the name and address of the witness and the subject matter on which the witness is expected to testify.

ANSWER: Unknown at this time; investigation and trial preparation continues.

9. With regard to the opinion witness identified in Interrogatory No. 8, state the conclusions and opinions of the witness, the qualifications of the witness to express the conclusions and opinions, and the basis for the witness' conclusions and opinions.

ANSWER: Unknown at this time; investigation and trial preparation continues.

10. With respect to the injuries you claim the decedent suffered as a result of the occurrence, state the general nature of the injuries suffered including those suffered prior to death.

ANSWER: Glen Wiser died at the scene of the accident as a result of blunt chest and abdominal trauma.

11. With regard to said injuries, state the name, address and phone number of each attending or consulting physician, the name, address and phone number of each person or laboratory taking an x-ray of the decedent, the date or inclusive dates on which each of them rendered the decedent service, and the amounts to date of their respective bills for service.

ANSWER: Glen Wiser died at the scene of the accident.

12. As a result of said personal injuries, was the decedent a patient or out-patient in any hospital or clinic?

ANSWER: No.

13. State whether an autopsy was performed on the decedent and, if so, state the name and last known address of the person performing said autopsy, the date it was performed and the place it was performed.

ANSWER: According to the Certificate of Death, an autopsy was performed.

14. State the exact cause of death of the decedent and the names and last known addresses of all persons having knowledge as to the cause of death, including but not limited to the name of the medical examiner and the date the certificate of death was issued.

ANSWER: Glen Wiser died on March 7, 2007 as the result of blunt chest and abdominal trauma according to the Certificate of Death signed on March 21, 2007 by Patrick K. O'Neil of the Medical Examiner's-Coroner's Office.

15. State each and every employer of the plaintiff's decedent for the ten (10) year period preceding the occurrence.

ANSWER: Glen Wiser was a carpenter prior to his retirement.

16. List and itemize all sources of income being received by plaintiff's decedent as of the date of the occurrence, including but not limited to wages or dividends, social security payments, pensions and financial support furnished by any person or company.

ANSWER: Chicago Regional Council of Carpenters Pension Fund
12 East Erie Street
Chicago, IL 60611

Social Security Benefits

17. State any and all other expenses or losses claimed by you as a result of said occurrence.

ANSWER: Funeral expenses.

18. State whether the plaintiff's decedent had ever made a claim or filed any other suit or legal action (including but not limited to worker's compensation) of any kind for an injury claimed to have been sustained before the occurrence complained of, and if so, state the case name, title and docket number, the year filed, the court in which filed and the disposition of the case or action.

ANSWER: None.

19. During the five years immediately prior to the date of said occurrence, had the plaintiff's decedent been confined in a hospital, treated by a physician or x-rayed for any reason? If so, give the name and address of each such hospital, physician, technician or clinic, the approximate date of such confinement or service, and state in general the reason for such confinement or service.

ANSWER: Plaintiff believes that Glen Wiser had cataract surgery (right eye) in October of 2006, however, she has no other information responsive to this interrogatory.

20. Since the date of said occurrence, had the decedent suffered any personal injury or illness that required the care of a doctor? If so, state when, where and in general how the plaintiff's decedent was injured or when plaintiff's decedent was ill and describe in general the injuries suffered or the illness.

ANSWER: No.

21. Were any photographs taken of the scene of the occurrence or of the persons or vehicles involved? If so, state the date or dates on which such photographs were taken, the subjects thereof, and who now has custody of them.

ANSWER: Yes. Plaintiff and her attorney, Edmund J. Scanlan, are in possession of eight (8) photographs of the plaintiff's decedents' vehicle taken on March 8, 2007 at Kochel's Towing; seven (7) photographs of the defendants' vehicle taken on March 8, 2007 at Kochel's Towing; and five (5) photographs of the site where the accident occurred taken on March 8, 2007. The aforesaid photographs were taken by Warren Weiss (plaintiff's best friend's husband), 14707 E5000 N Road, Momence, IL 60954.

22. Do you have statements from any witnesses or parties other than yourself? If so, give the name and address of each such witness, the date of said statement, and state whether such statement was written or oral.

ANSWER: None at this time, other than what is contained in the traffic accident report; investigation continues.

23. List the names and addresses of all other persons (other than yourself and persons heretofore listed or specifically excluded) who have knowledge of the facts of said occurrence or of the injuries and damages following therefrom.

ANSWER: Debbie Weiss, plaintiff's best friend, 14707 E5000 N Road, Momence, IL 60954; Warren Weiss, 14707 E5000 N Road, Memoence, IL 60954.

24. State any and all physical and/or mental disabilities, defects, limitations or handicaps from which the plaintiff's decedent suffered at any time in his/her life prior to the date of the occurrence including but not limited to those present at birth.

ANSWER: None of which plaintiff is aware.

25. List the name, address and telephone number of each and every individual who may be called to testify or who has knowledge that plaintiff's decedent survived for any period of time after the initial impact between the plaintiff's decedent and the truck.

ANSWER: Unknown to plaintiff.

26. Identify each and every Federal, Illinois or local statute, ordinance, rule, regulation, requirement, guideline or other provision of any kind or nature whatsoever which plaintiff claims defendant has violated.

ANSWER:

Defendants backed up their semi-tractor trailer in a situation where such movement could not be made without interfering with the right-of-way of the plaintiff's decedent's eastbound vehicle, in violation of 625 ILCS 5/11-1402(a);

Defendants failed to properly chart the route that defendants' semi-tractor trailer can operate upon, in violation of Federal Motor Carrier Regulations;

Defendants failed to stop their vehicle to avoid colliding with the plaintiff's decedent's vehicle while backing up on South Ashland Avenue at its intersection with Goodenow Road, in violation of 625 ILCS 5/11-601(a);

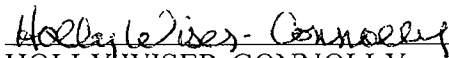
Defendants failed to yield the right-of-way to the plaintiff's decedent's eastbound vehicle on Goodenow Road, in violation of 625 ILCS 5/11-904(b);

Defendants failed to decrease the speed of their vehicle in reverse to avoid colliding with plaintiff's decedent's vehicle, in violation of 625 ILCS 5/11-601(a); and

Defendants failed to yield the right-of-way to the plaintiff's decedent's eastbound vehicle on Goodenow Road, in violation of 625 ILCS 5/11-1204(b).

VERIFICATION

Under penalties as provided by law pursuant to 735 ILCS 5/1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief, and as to such matters, the undersigned certifies as aforesaid that she verily believes the same to be true.



HOLLY WISER-CONNOLLY, as
Independent Executor of the Estate of
GLEN R. WISER, Deceased

Edmund J. Scanlan
SCANLAN LAW GROUP
Attorney for Plaintiff
8 South Michigan Avenue, Suite 2700
Chicago, Illinois 60603
Telephone: (312) 422-0343
Facsimile: (312) 422-0358
Email: ejs@scanlanlawgroup.com
ARDC #: 02466643